



September 14, 2011

The Honorable Hugh Crawford
124 North Capitol Avenue
P.O. Box 30014
Lansing, MI 48909-7514

Re: H.B. 4561 and Energy Codes

Dear Chairman Crawford:

The House Regulatory Reform Committee will consider H.B. 4561, which makes several changes to the Single State Construction Code Act. This bill would, among other things, allow the state to update different elements of the construction codes on a three year or a six year cycle, as opposed to mandating that codes be updated every three years – regardless of whether the Department of Licensing and Regulation determines the updates to be necessary. **On behalf of the Coalition for Fair Energy Codes (CFEC), I am writing in support of this legislation as it will provide Michigan building officials with more flexibility in its adoption of building codes.**

CFEC is a group of building product manufacturers and associations, the home building industry, and other parties interested in advancing fair and impartial treatment of all building products, including wood products, in the International Energy Conservation Code and in energy codes adopted by states. The U.S. wood products industry makes products essential to everyday life from a renewable resource that absorbs and sequesters carbon. The industry employs a third of a million people in the United States in well paying, rural jobs. In Michigan, the wood products industry employs over 13,000 individuals with an annual payroll of \$433 million. The estimated state and local taxes paid by the wood products industry is \$24 million annually.

As stated, CFEC supports the adoption of H.B. 4561. The current draft of the bill will allow the Director time to assess the efficacy and the cost impacts of new and technically challenging code requirements inherent in new editions of model codes. Expanding the time between Michigan code editions will allow a more thorough review and afford better performance to the citizens of Michigan.

Moreover, even as currently written, the Michigan Building Code, including energy code provisions, does not prevent improved performance or new and innovative materials. The Michigan Code is a minimum code and designers and owners will

continue to be free to exceed the minimum performance requirements. This should result in better performing buildings with a minimum cost impact in achieving that performance.

CFEC appreciates the opportunity to present our views regarding energy codes. Again, we urge you to favorably report H.B. 4561. If you have any questions, please do not hesitate to contact Kevin Callahan, Manager of Government Affairs, at 202.463.2433

Sincerely,

Eric Borsting
Executive Director, Coalition for Fair Energy Codes

cc: Representative Joseph Haveman
Members of the House Regulatory Reform Committee